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*Attorneys for Defendant
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO COMPEL DEPOSITION OF
LARRY PAGE**

Courtroom: F, 15th Floor
Judge: Honorable Jacqueline S. Corley
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:

1. Declaration of James Lin
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this motion for an order to file under seal its Motion to Compel Deposition of Larry Page (the “Motion”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal
Letter Brief re Deposition of Larry Page	Highlighted Portions
Exhibit 1 – Transcript of the deposition of Larry Page, dated July 17, 2017	Highlighted Portions
Exhibit 2 – Meet and confer email between counsel, dated July 30, 2017	Highlighted Portions
Exhibit 3 – Excerpts from the transcript of the Deposition of Zachary Morriss, dated July 26, 2017	Entire Document
Exhibit 4 – Excerpts from the transcript of the deposition of Bryan Salesky, dated July 24, 2017	Entire Document
Exhibit 5 – Email between Sebastian Thrun and Larry Page, dated April 11, 2015, Bates WAYMO-UBER-00026174	Entire Document

The above referenced documents and portions of documents contain information designated by Plaintiff Waymo LLC as either Highly Confidential—Attorneys’ Eyes Only” or “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in Exhibit 2-5. However, it objects to the merits of portions of the sealing material designated by Waymo in Exhibits 1, portions of the transcript from the deposition of Larry Page, and will meet and confer with Waymo about the designations.

Otto Trucking anticipates that Waymo will file a declaration in accordance with Local Rule 79-5.

Otto Trucking's request to seal is narrowly tailored to those portions of the Motion's supporting documents that merit provisional sealing.

Dated: August 2, 2017

Respectfully submitted,

By: /s/ James Lin

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on August 2, 2017. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of August 2017 in Menlo Park, California.

/s/ James Lin
James Lin